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IN THE CIRCUIT COURT OF MONROE COUNTY, MISSISSIPPI

MONROE COUNTY, MISSISSIPPI

PETITIONER

vs.

Cause No. 2016-337-RM

ESTATE OF GREGORY KEETON,
HEIRS AT LAW OF GREGORY KEETON, and
THE PROPERTY LISTED IN THE PETITION

DEFENDANTS

PETITION FOR FORFEITURE

Comes now Monroe County, Mississippi, by and through its attorney, and files this, its Petition for Forfeiture against the Estate of Gregory Keeton, the Heirs at Law of Gregory Keeton, and The Property Listed in the Petition, herein the "Defendants", and in support thereof would respectfully show unto the Court the following:

I.

Monroe County, Mississippi, (herein "Petitioner"), is a political subdivision of the State of Mississippi, and is authorized to file this Petition and to seek the relief sought herein under the Uniform Controlled Substances Law, §§ 41-29-101 - 41-29-191 M.C.A. of 1972, as amended.

II.

As allowable by Section 41-29-177 M.C.A. of 1972, as amended, the Petitioner files this Petition in Monroe County where the seizure was made. Monroe County is an appropriate venue for this action.

III.

The Monroe County Circuit Court has jurisdiction over the persons, property, and subject matter in this cause of action.

EXHIBIT

F

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IV.

The personal representative of the Estate of Gregory Keeton and the heirs at law of Gregory Keeton are yet to be determined by the Petitioner. Once determined, they may be served at such place or places as they may be found.

V.

The Petitioner additionally files this suit In Rem against the property sought to be seized by this Petition. This property is currently in the possession of the Monroe County Sheriff's Department.

VI.

The property that is the subject of this Petition, for which Petitioner is seeking a full and complete forfeiture of, (herein the "Property"), is more particularly described as follows:

\$662.00 CASH

and

The additional property described in Exhibit "A" attached hereto and fully incorporated herein.

VII.

The Property that is the subject of this Petition, for which forfeiture is sought, exceeds the value of Twenty Thousand Dollars (\$20,000.00).

VIII.

The Petitioner would show that the actions and the events that took place on October 28, 2015 resulted in violations of the Uniform Controlled Substances Law.

IX.

The Petitioner would show that the Property is eligible for forfeiture under the provisions of the Uniform Controlled Substances Law, §§ 41-29-101 - 41-29-191 M.C.A. of 1972, as amended.

X.

Petitioner would affirmatively show that the predicates and requirements for forfeiture under the Uniform Controlled Substances Law are met upon the facts of this matter, and that all of the Property should be forfeited to the Petitioner.

XI.

Petitioner would show that Gregory Keeton, the Estate of Gregory Keeton and/or his Heirs at Law of Gregory Keeton are the owner(s) and/or person(s) in possession of all of the Property for which the County seeks forfeiture.

XII.

Petitioner would show that the Petitioner and the Monroe County Sheriff's Department, through its agents and employees, performed a lawful search and seizure and complied with all requirements of due process. Further, Petitioner did not violate any constitutional rights of the Defendant.

WHEREFORE, PREMISES CONSIDERED, Petitioner prays as follows:

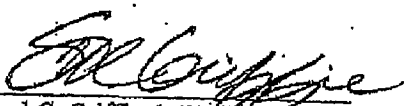
1. That this Petition be received and filed;
2. That process issue for all appropriate parties in this cause;
3. That the Court set a date and time for the hearing of this matter;
4. That the Court find that the Property set out herein is eligible for forfeiture;
5. That the Court would find that the predicates and requirements of the Uniform Controlled Substances Law have been met for purposes of forfeiture;

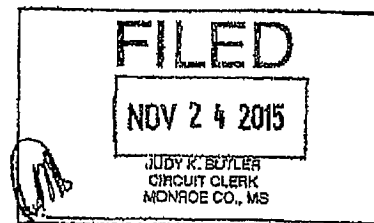
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6. That all of the Property that is the subject of this Petition would be fully and completely forfeited to the Petitioner and the Monroe County Sheriff's Department; and
7. Petitioner prays that it be awarded such other and further relief to which it may be entitled including general relief.

Respectfully Submitted,

By: 
Samuel C. Griffie, MSB#16358
Creekmore Law Office, PLLC
Attorney for Petitioner
P.O. Box 716
Amory, MS 38821



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04' Tan Chevy Colorado
16CDS196358160195

~~Grey Dodge Charger~~
~~2B3KA53H1711614910~~ } RETURNED

97' Green Chevy Tahoe
16NEC13D9VJ431216

92' Maroon Chevy S-10
16CCS19RXNE166341

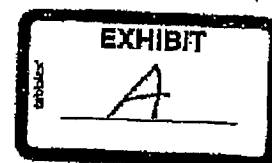
06' Grey Chevy Impala
2G1WB58K569343322

White Ford Pickup
115MF100281C05

01' Red Chevy Camaro
2G1FP32K31213202

Black Silverado Flat Bed
6CHC33W46514949D

Black Ford Wrecker



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Side x Side ATV - Joyner
LSBU2JH6381018558

Generac 5500 Watt Generator
050517YE29955

Cub Cadet RZT
FRL691VA42316

Husqvarna Riding Mower
092308A017228

Chicago Electric Welder
0912-36537-0191

Lincoln Electric Welder
M3090507254

Stand-Up Shop Fan - Chicago
HVP-30E

Chicago Welding Cart
354481339

16 ft Allwood Utility Trailer

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AMMO. CAN

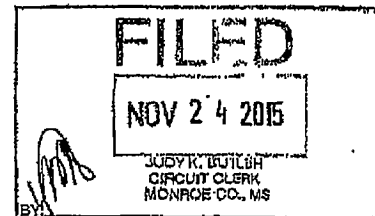
Surveillance Camera found in kitchen and outside

SAM Sung Laptop SN# HQA91HC 709663A

Sony Cell Phone SN# B0A511 51290716

IMPulse 500 subwoofer SN#s (1) 10642774 (2) 10642772
which also has "Bad Land."

Peavey AMP SN# OBH02778



CERTIFICATE OF SERVICE

The undersigned certifies that he has this day served a copy of the above and foregoing Motion to the following by United States Mail, postage prepaid:

Hon. Kelly L. Mims
Attorney at Law
P.O. Box 826
Tupelo, MS 38802

And by email to:

kelly@kellymims.com

This the ^{ca}3 day of March, 2016.


Samuel C. Griffie